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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BERTHA MORA, individually;

Plaintiff,

vs.

JOSEPH JOHN TOMASULO, individually;
and DOES 1 through 10; and ROE
ENTITIES 11 through 20, inclusive,

Defendants.

Case No.: 2:19-cv-01423-GMN-BNW

STIPULATION AND ORDER TO
CONTINUE TRIAL

COMES NOW Plaintiff, BERTHA MORA, by and through her counsel of record LAWRENCE M. RUIZ, ESQ., of the RUIZ LAW FIRM, and Defendant JOSEPH JOHN TOMASULO, by and through his counsel of record CHRISTINA MUNDY-MAMER, ESQ., of MESSNER REEVES, LLP., and hereby stipulate and request that this Court continue the trial currently set for January 24, 2022, at 8:30 a.m.

This request is necessary as Plaintiff's counsel has recently brought in co-counsel to assist in the trying of this matter and they are unavailable for the current trial setting. In addition, following the COVID-19 public health crisis, both parties' expert witnesses are experiencing scheduling difficulties. The parties' medical experts are also facing additional demands in their

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daily practice resulting from the extended state of emergency. As such, the parties merely require additional time to assure that their respective experts are available to testify at the time of trial.

The parties have conferred regarding their respective availability and propose the trial be continued to the April stack, as all parties are available.,

The parties further request a deadline for all dispositive Motions and Motions *in Limine* be set ninety (90) days before the date of trial.

This is the third request for continuance of trial in this matter. This stipulation and request is entered into in good faith and not for the purposes of delay.

APPROVED AS TO FORM AND CONTENT.

RUIZ LAW FIRM

MESSNER REEVES, LLP.

/s/ Lawrence Ruiz
 LAWRENCE RUIZ, ESQ.
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Attorney for Plaintiff

/s/ Christina Mundy-Mamer
 M. CALEB MEYER, ESQ.
 Nevada Bar No. 13379
 RENEE M. FINCH, ESQ.
 Nevada Bar No. 13118
 CHRISTINA MUNDY-MAMER, Esq.
 Nevada Bar no. 13181
 8945 W. Russell Road, Suite 300
 Las Vegas, NV 89148
Attorneys for Defendant

IT IS HEREBY ORDERED that the Stipulation is GRANTED in part and DENIED IN PART.

The Court GRANTS a continuance of trial to the April 25, 2022 trial stack.

The Court GRANTS an extension of the Motion in Limine deadline and a new deadline will be provided in the Order Regarding Trial.

The Court DENIES the parties request to extend the dispositive motions deadline.

IT IS SO ORDERED:


 UNITED STATES DISTRICT JUDGE

Dated: December 21, 2021

Tammy Wagner

From: Lawrence Ruiz
Sent: Tuesday, December 7, 2021 3:18 PM
To: Tammy Wagner
Subject: FW: Stip and Order.3rd Request

Lawrence M. Ruiz, Esq.

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From: Christina Mundy-Mamer <CMamer@messner.com>
Sent: Tuesday, December 7, 2021 3:17 PM
To: Lawrence Ruiz <lawrence@lmruizlaw.com>
Subject: RE: Stip and Order.3rd Request

Hi Lawrence:

You can affix my e-signature to this stipulation.

Sincerely,

Christina Mundy Mamer

Partner

Messner Reeves LLP

M: 702.363.5100 **E:** cmamer@messner.com
8945 W. Russell Road, Suite 300, Las Vegas, NV 89148

From: Lawrence Ruiz <lawrence@lmruizlaw.com>
Sent: Tuesday, December 7, 2021 12:15 PM
To: Christina Mundy-Mamer <CMamer@messner.com>
Subject: Stip and Order.3rd Request

Here is a draft. Let me know if you want me to change anything.

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